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Subject: Draft Agenda for 1/28 ARARs Meeting
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Eric, Chip, Lori, Kristine, & Deb,

I wanted to float this draft agenda for our Thurs 1/28 ARARs meeting by you all. The meeting is schedule in Room 1A DEQ's NW Region (1st floor) starting at 1:15. Please reply or call me with any questions, concerns, or edits to what you'd like in the agenda & the meeting.

Draft Meeting Agenda

1.0 Purpose of Meeting- Discuss/resolve questions of how water quality ARARs are applied. Particularly MCLs in pore water & groundwater.

2.0 Desired Outcomes of Meeting

- 2.1 Clearly define issue(s) in question
- 2.2 Clearly define both DEQ's position & EPA's position on issue(s)
- 2.3 Either resolve the outstanding issue(s) or define a clear path & schedule to resolution

3.0 Definition of Issues (The following are DEQ's nominations)

- 3.1 What triggers the need for an upland GW source control measure based on WQC for protection of aquatic life (i.e., chronic AWQC)? Does as little as a single exceedance of a chronic AWQC in a top-of-bank monitoring well require consideration of source control measures? Can a lines-of-evidence (LOE) & weight-of-evidence (WOE) approach be used to determine if the source control is needed?
- 3.2 What triggers the need for an upland GW source control measure based on WQC for protection of human health (i.e., organism or organism & water consumption AWQC)? Does as little as a single exceedance of a chronic AWQC in a top-of-bank monitoring well require consideration of source control measures? Can a LOE & WOE approach be used to determine if the source control is needed?
- 3.3 What triggers the need for an upland GW source control measure based on the drinking water standards (MCLs)? Should MCLs be an ARAR for pore water & GW? Does as little as a single exceedance of an MCL in groundwater in a top-of-bank monitoring well require the consideration of source control measures? If so, do MCLs need to be met throughout the GW

plume? And if there is no MCL exceedance at a downgradient point of compliance, does EPA expect the entire plume to be remediated solely to protect upland drinking water?

4.0 Agencies' Positions

4.1 DEQ's Positions

4.1.1 DEQ's Position on 3.1-

4.1.2 DEQ's Position on 3.2-

4.1.3 DEQ's Position on 3.3-

4.2 EPA's Positions

4.2.1 EPA's Position on 3.1-

4.2.2 EPA's Position on 3.2-

4.2.3 EPA's Position on 3.3-

5.0 Discussion of Issues Applied to Likely Scenarios

6.0 Next Steps

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